

Regarding Docket Number 95-155

Dear FCC,

In regard the the “Emergency” filing by SAMHSA to seize the “1-800-SUICIDE numbers” from the Kristen Brooks Hope Center, I am appalled at the notion that the Federal government can attempt to seize, for its own purposes, a number owned by a private corporation in this manner. SAMHSA has claimed that the 1-800-SUICIDE number is at risk for being disconnected; however, this does not appear to be true. Patriot Communications may have issued such a threat; however, it is questionable whether they can legally do this. It would appear that they could decide to discontinue their service, following the guidance under the law and the FCC. Another TELCO could elect to provide these services and to transfer the numbers. I suspect that Patriot Communications has colluded with SAMHSA to seize this number, which SAMHSA has coveted for several years. Patriot does significant business with SAMHSA and it may possibly be offering leverage on this for its “partner”, SAMHSA.

There is another way to resolve this issue and the Kristen Brooks Hope Center has been willing to transfer use of these numbers to SAMHSA if they would resolve past due debts to Kristen Brooks. The failure of SAMHSA to meet its obligations has played a major role in creating this “emergency”.

Of concern is that, by the Federal government seizing this number, its use in Canada would be interrupted and prevented. Canadian non-profit business have invested heavily in this number and its dissemination to serve its citizens at risk for suicide. There are legal impediments for SAMHSA to fund this line for foreign use and, to our knowledge, this issue has not been addressed in a way that Canadians will not lose a vital service.

Perhaps these issues are beyond the purview of the FCC to investigate and decisions made based upon the scope of the FCC authority; however, I hope to convey that there is more to this issue than has been presented to you and that the “emergency” nature of this action may well be overstated. While it may be beyond the scope of the FCC, mediation or arbitration of the long standing dispute would be the wiser course in order to resolve these issues and to protect vulnerable citizens from precipitous and unwise actions.

As you can tell, I am not an attorney; however, there are issues of fairness and “doing the right thing” that should come to play in your deliberations in this matter. Please consider these points as well as the other input that you will receive on this important matter.

Sincerely Yours,

William H. Pell